

HARRIS ST. LAURENT LLP
Megan Dubatowka
Reid Skibell (*pro hac vice* app. to follow)
40 Wall Street, 53rd Floor
New York, NY 10005
(212) 397-3370

SBAITI & COMPANY PLLC
Mazin A. Sbaiti (*pro hac vice* app. to follow)
1201 Elm Street, St. 4010
Dallas, TX 75270
(214) 432-2899

*Attorneys for Proposed Intervenor Savant Neglected
Diseases LLC*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MADISON JOINT VENTURE LLC,

Plaintiff,

v.

CHEMO RESEARCH S.L., EXELTIS
USA, INC., and SERGIO SOSA-
ESTANI,

Defendants.

Case No. 2:19-cv-8012-JMV-SCM

DECLARATION OF MEGAN DUBATOWKA

MEGAN DUBATOWKA, an attorney duly admitted to practice law in the Courts of the State of New Jersey and this Court, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

1. I am an attorney admitted to practice before the courts of the State of New Jersey and the United States District Court for the District of New Jersey. I am Counsel to the law firm

Harris St. Laurent LLP, co-counsel for proposed intervenor Savant Neglected Diseases LLC (“Savant”). As such, I am fully familiar with the facts and circumstances stated herein.

2. I make this declaration in support of Savant’s Motion to Intervene and for a Stay.

3. Attached as Exhibit 1 hereto is a draft complaint for this action setting forth Savant’s claims against Defendants Chemo Research S.L. (“Chemo”), Exeltis USA, Inc., and Sergio Sosa-Estani.


4. Attached as Exhibit 2 is a true and correct copy of Savant’s First Amended Verified Complaint in the Delaware Litigation, dated August 27, 2019. While this complaint is captioned for the Court of Chancery in Delaware, the case was subsequently transferred to the Delaware Superior Court and consolidated with a related action into *Humanigen, Inc., et al. v. Savant Neglected Diseases, LLC*, C.A. N17C-07-068-PRW [CCLD].

5. Attached as Exhibit 3 is a true and correct copy of a case management order entered in the Delaware Litigation on September 30, 2020.

6. Attached as Exhibit 4 hereto is a true and correct copy of an Opinion and Order entered on August 17, 2020 in the Delaware Litigation resolving the parties’ respective motions to dismiss and for summary judgment.

7. Attached as Exhibit 5 hereto are true and correct copies of two articles detailing Marc Bistricher’s role in the collapse in the share price of a shipping company, and his role in a supposed scheme to profit off of the Covid-19 pandemic.

Dated: October 9, 2020
New York, NY


Megan Dubatowka